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August 7, 2012

By Fax: 212: 805-6304

Honorable Paul A. Crotty
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

✓ **SO ORDERED:** 8-8-12
Paul A. Crotty
HON. PAUL A. CROTTY
UNITED STATES DISTRICT JUDGE

United States v. Smirnov, et al.
11 Cr 893 (PAC)

Dear Judge Crotty:

✓ I represent defendant Irene Todd in the above-referenced matter. This letter is an application to request that the conditions of Mrs Todd's bail be temporarily modified to permit her to travel to Sugar Land Texas from August 10, to August 21, 2012 in order to care for her grandchild while her daughter and son-in-law are out of town on a business trip.

Originally, Mrs. Todd's daughter, who works with her husband in their own business was not intending to travel with her husband, but the employee who was to accompany Mrs. Todd's son-in-law had to cancel out of the trip unexpectedly, so Mrs. Todd's daughter is going to take his place. Their efforts to obtain a local babysitters for that time period were unsuccessful, hence this "last-minute" application. Mrs Todd is released on a \$150,000 bond which is co-signed by two suretors.

I have discussed this application with Pre-Trial Services Officer Emily Rosado and she has no objection to it, so long as Mrs Todd provides Pre-Trial Services with her travel itinerary and contact information. Yesterday, I sent emails to Assistant United States Attorneys Danya Perry and Rosemary Nidiry regarding this application, but am still awaiting a response.¹

¹ The government has had no objections to any previous travel applications.

MEMO ENDORSED

Honorable Paul A. Crotty

August 7, 2012

Accordingly, it is respectfully requested that the Court grant a temporary modification of the conditions of Mrs Todd's bail to permit her to travel to Sugar Land Texas from August 10 to August 21, 2012 and direct that she provide her travel itinerary and contact information to Pre-Trial Services.

Very truly yours,



Joyce C. London .

cc.: AUSAs Danya Perry and Rosemary Nidiry (By Email)
PTSO Emily Rosado (By Email)